



CONTINGENT EMPLOYEE DATA PRIVACY NOTICE

Effective April 2026

OVERVIEW

accesso is committed to protecting the privacy and security of all individuals, including our contingent workers. This Notice describes how Accesso Technology Group Plc and its affiliates (collectively, “**accesso**”) act as data controllers with respect to the collection, use, and disclosure, of personal data about its contractors (“Contingent Workers”).

SCOPE AND PURPOSE

This notice applies to all personal data collected, processed, and maintained by **accesso** in relation to its contingent workers’ engagements in compliance with applicable data protection laws and regulations. It provides detailed information on the types of personal data collected, the purposes for which it is used, the third parties with whom it may be shared, and the rights and choices available to contingent workers regarding their personal data.

1. PERSONAL DATA WE COLLECT

1.1. Personal Information

In the course of your relationship with **accesso** as a Contingent Worker, we may collect the following categories of personal data about you, directly from you and from other sources.

- Name, identity and contact details such as your name, date of birth, nationality, citizenship, gender, email address, telephone numbers, physical address;
- Professional or employment-related information such as a description of your current position, job title, your employer (name and location), start and termination date(s) and reasons, and length of service;
- Educational information such as your academic history, qualifications, professional certifications and skills;

- Emergency contact information of individuals whose information you have provided. Where you provide us with emergency contact details of another individual, you are responsible for informing that person that their data has been shared with us;
- Publicly available information about you from sources such as social media sites (for example, LinkedIn); and
- Other information you choose to share with us such as hobbies and personal or social preferences.

1.2. Sensitive Personal Information We Collect

Some of the personal information we collect about you may be considered “Sensitive” under applicable laws. We will collect Sensitive personal information from you where we have a legal obligation to do so or with your explicit consent. The types of Sensitive personal information we process may include:

- Identity and Immigration Information such as social security number, passport, driver’s license, details of residency and work permit for purposes of verifying your legal ability to work and to maintain your employment with **accesso**;
- Biometric Identifiers (such as fingerprints or facial recognition data), where used solely to authenticate your access to company systems and applications;
- Financial information such as bank account details for payment processing.

1.3. Personal Information We Collect Automatically

We may also collect information about you using cookies and similar technologies when you visit or browse our website. This may include your IP address, browser type, device identifiers, pages visited, and time spent on pages. For details of our cookie practices, please see our [Cookie Notice](#).

1.4. Information We Collect from Other Sources

- Background check information such as criminal records history, educational history, employment history and /or compensation history from employment screening agencies, former educational institutions and /or former employers (as permitted by applicable local laws)
- Performance-related information, such as references or feedback provided by former employers or supervisors.

2. HOW WE USE YOUR PERSONAL DATA (PURPOSES OF PROCESSING)

We use your personal data to manage your working relationship with us and to fulfil our legal and contractual obligations, including for the following:

- Facilitating compliance with contractual and legal obligations, such as any contract we may have with you or your Supplier;
- Administration and delivery of the Supplier contract, assessing your onboarding application, and supporting your engagement with *accesso*;
- Background checks and verification of references and qualifications, processing payroll, withholding taxes (or addressing other income tax matters), or complying with various reporting or disclosure obligations under applicable law;
- Authorizing, granting, administering, monitoring, improving, and terminating access to, or use of, company-issued or company-authorized applications and systems (including social media), Information Resources, and records, to the extent permitted by and in compliance with applicable law;
- Protecting company assets, including in connection with internal investigations, through: (a) monitoring and review of email, communications, and information on company Information Resources to the extent permitted by and in compliance with law; (b) backup or storage of information on company desktops/laptops and other company Information Resources; and (c) authentication of employees' identities and the implementation of security measures;
- Facilitating internal communications and collaboration, including meeting recording and transcription using automated or AI-enabled tools for documentation, note-taking, and productivity purposes;
- Complying with legal requirements, requests from regulatory and law enforcement authorities and meeting contractual obligations;
- Management of the assignment, attendance, performance evaluation and feedback;
- Monitoring compliance with *accesso*'s policies, procedures and processes;
- Maintaining global address list; and
- Other legitimate business reasons permitted or required by applicable law.

3. LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

The legal bases on which we collect or process your personal data will depend on the specific personal information and the context in which we collect it. The processing of your personal data will take place based on one or more of the following legal bases where and to the extent they are permitted by applicable law:

- To comply with our legal obligations;

- For the performance of a contract (e.g., to execute an agreement between you and **accesso** or you and the Supplier);
- With your consent, where we rely on consent as legal basis for processing. You have the right to withdraw your consent at any time without detriment. To withdraw consent, please contact PrivacyContact@accesso.com; and
- To meet our legitimate interests (e.g., facilitating collaboration, documenting business discussions, and improving productivity), so long as those legitimate interests are not overridden by your fundamental rights or interests.

Use of Automated and AI-Enabled Tools

Some of the tools we use incorporate automated or AI-enabled features, such as meeting transcription and note-taking, for administrative and productivity purposes only. These tools are used solely to support documentation and internal collaboration and are not used to make decisions that produce legal effects or otherwise significantly affect you. No profiling or automated decision-making is carried out using these tools. Where we use such tools, we do so on the basis of our legitimate interests in facilitating efficient business operations, balanced against your right to transparency about how your personal data is used in this context.

4. DISCLOSURE OF YOUR PERSONAL DATA

We may disclose your personal data to the following parties for the purposes described in this Notice:

- Service providers and business partners that perform specific services on our behalf (for example, payroll processing, other administrative services, and third-party auditors) as permitted by applicable law;
- Government authorities, regulatory bodies, tax authorities, and law enforcement agencies, where necessary to comply with legal or regulatory obligations;
- Other entities within our corporate group for internal administrative purposes; and
- For California residents: **accesso** does not “sell” or “share” your personal data for cross-context behavioral advertising as those terms are defined under the California Consumer Privacy Act (CCPA) as amended by the CPRA. **accesso** also does not use or disclose sensitive personal information (as defined under CPRA) for purposes beyond those permitted without offering a right to limit.

5. TRANSFERS OF PERSONAL DATA

accesso processes your personal data through our global platforms and on local systems. Operating our global platforms will involve transferring your personal data outside of your country to other countries where we operate and do business, including the United States, Canada, Mexico, Australia, and other jurisdictions. This means that when we collect your personal data it may be processed in countries that have data protection laws that do not offer the same level of protection as your country of residence. However, **accesso** will implement appropriate measures to provide a level of protection for personal information that is comparable to that of your country of residence which will include, as appropriate: (a) Standard Contractual Clauses approved by relevant regulatory bodies; or (b) other lawful transfer mechanisms under applicable law.

6. DATA SECURITY

Protecting your data is fundamental to our business approach, and we allocate substantial resources to ensure its security. We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental loss, destruction, alteration and to restrict access on a need-to-know basis.

7. DATA RETENTION

accesso will retain personal data for the period necessary to fulfill the purposes set out in this Notice unless a longer retention period is required or permitted by law. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- the length of our relationship with you;
- whether there is a legal obligation to which we are subject and,
- whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

Specific retention periods for each category of personal data are set out in **accesso's** Data Retention Schedule, a copy of which is available on request by contacting PrivacyContact@accesso.com.

8. YOUR RIGHTS

Subject to and to the extent provided under applicable law, you may have certain rights regarding your personal data including:

- The right to request access to, or copies of, your Personal Data that we process;
- The right to request rectification of any inaccuracies in your Personal Data that we process;
- The right to request erasure of your Personal Data that we process or control;
- The right to object to or restrict the processing of your Personal Data;

- The right to data portability—i.e., to receive your Personal Data in a structured, commonly used, and machine-readable format, and to transmit it to another controller, where technically feasible;
- The right not to be subject to solely automated decision-making, including profiling, that produces legal effects or similarly significantly affects you (where applicable under local law); and
- The right to lodge complaints with your relevant Data Protection Authority regarding the processing of your personal data by us.

accesso will not discriminate against you for exercising your rights described in this Notice. We may need to request specific information from you to help verify and confirm your identity before we can respond to any of your rights requests.

To exercise any of your rights relating to your personal data, please submit your request via our webform at <https://www.accesso.com/forms/data-subject-access-request> or send an email to the Privacy Team at PrivacyContact@accesso.com.

9. CHANGES TO THIS NOTICE

This Notice was last updated in April 2026. We may update this Notice from time to time. When we do, we will notify you by appropriate means, such as by posting an updated Notice on **accesso's** careers website or by direct notification.

10. CONTACT US

If you have any questions or concerns about how your personal information is processed, please contact the Privacy Team at PrivacyContact@accesso.com.